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VIA ECF

Honorable Colleen MacMahon  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

May 15, 2023

MEMO ENDORSED  
5/30/23

Permission to travel as  
requested herein is  
granted

*Colleen MacMahon*

Re: *United States v. Joseph Bailey*  
19 Cr. 412 (CM)

Dear Judge MacMahon:

We represent the defendant, Joseph Bailey, in the above-referenced matter. We are writing to request the Court's permission for Mr. Bailey to travel to Italy and Israel between July 10, 2023 to July 23, 2023. We are advised by Assistant United States Attorney Dina McLeod that the government has no objection to this request. ✓

Mr. Bailey pleaded guilty to one count of violating 18 USC 1349 (conspiracy to commit wire fraud) on January 15, 2020. Mr. Bailey was sentenced by the Court on December 22, 2020 to a term of imprisonment of six months, followed by a term of supervised release of three years. Mr. Bailey surrendered to the custody of the Bureau of Prisons ("BOP") on October 7, 2021 to serve his sentence. Mr. Bailey has since been released from BOP custody and is on supervised release. Mr. Bailey has complied with all of the terms of his supervised release. In addition, Mr. Bailey has fully satisfied the restitution and forfeiture obligations arising from this case. Finally, during the period of his pre-trial release Mr. Bailey complied with all terms imposed by pre-trial services.

Mr. Bailey seeks permission to travel to Italy as a trip for his wife's 60<sup>th</sup> birthday. Afterwards, Mr. Bailey and his wife would like to visit their son and daughter-in-law, who will be residing in Israel for the summer. Mr. Bailey will be accompanied on the entire trip by his wife.

We respectfully request that the Court allow the requested travel.

Respectfully,

A handwritten signature in black ink, appearing to be 'M. Sardar', written in a cursive style.

Michael Sardar

cc: AUSA Dina McLeod (by ECF)

Probation Officer Kristen K. Maharaj (Kristen\_maharaj@nyep.uscourts.gov)